



Reporting of T-Butyl Acetate (TBAC)

Effective December 29, 2004, the Environmental Protection Agency (U.S. EPA) no longer considered t-butyl acetate (TBAC) a Volatile Organic Compound (VOC) for purposes of permit emission limits or for material content requirements. It will, however, continue to require recordkeeping and reporting requirements similar to VOCs.

This means that facilities currently tracking their VOC usage will now also be required to track their TBAC usage as a separate category. In addition, TBAC emissions should be reported for the air emission inventory in the Consolidated Reporting System (CRS) as part of the VOC total. If the total VOC, including the TBAC, exceeds 6,000 pounds. The reporting information

was sent out by the Wisconsin Department of Natural Resources (DNR) on January 13, 2006.

EPA received a petition from a manufacturer requesting that TBAC not be considered a VOC. EPA reviewed the data and determined that the chemical is considered negligibly reactive, meaning the compound forms less ground-level ozone than ethane. As a result, the EPA has revised the definition of VOC to exclude TBAC for purposes of emission limits or product formulations. However, since even negligibly reactive compounds may contribute to ozone formation if present in sufficient quantities, EPA wants to continue tracking the usage of TBAC to determine its effects.

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Registration Operation Permits

Revisions to Wisconsin's State Implementation Plan (SIP) which establishes the Registration Permit Program and expands the use of General Permits was approved by the U.S. EPA in January. A Registration Permit allows small emitters to quickly register themselves for a permit in

return for keeping emissions low. This approval is expected to be effective in March. At that time Registration Operation Permit (ROP) templates and application materials will be available to facilities wanting coverage under ROPs. For more information, visit:

<http://dnr.wi.gov/org/aw/air/apii/regpermits.html>

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TBAC

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TBAC is a chemical that is currently used to make pharmaceutical, pesticides and other products. Since it may be a suitable substitute for more reactive and harmful substances like toluene and xylene, it is estimated that TBAC will soon be found in industrial coatings, adhesives, contact cement, and solvent based inks.

Determining whether TBAC is present in the materials used at your facility can be done by checking your Material Safety Data Sheets (MSDS). TBAC, with a CAS # 540-88-5, will be listed as an ingredient. This information is commonly found in the Hazardous Ingredients Section of the MSDS. If it is found here, you can determine how much TBAC is present in a gallon by multiplying the weight percent of the TBAC by the weight per gallon of the material, typically found in the Physical & Chemical Properties Section of the MSDS. This answer can then be multiplied by the number of gallons of material used to determine the total TBAC usage from this product.

What does this mean for reporting in Wisconsin?

When determining if an air quality permit (construction or operation permit) is needed:

TBAC still needs to be included in a facility's calculation of total VOC emissions when determining the facility's VOC potential to emit (PTE).

When preparing inventories of emissions: TBAC is subject to the same requirements as VOCs when reporting annual VOC emissions. This means that whenever a facility is required to track and report their VOC emissions, they should continue tracking and reporting their TBAC emissions as a VOC.

To summarize, for federal EPA reporting TBAC must be tracked separate from VOCs, but for state of Wisconsin reporting TBAC must be included in VOC emission reports and records.

**Practical Methods to Improve Painting Operations
Efficiency Workshop
Chicago, May 9-11, 2006**

www.ronjoseph.com/po.htm

Proposed Rule To Further Reduce Perchloroethylene Emissions

On December 9, 2005 the US EPA proposed new rules to further limit emissions of perchloroethylene (PERC) from dry cleaners across the country. The proposal would amend EPA's 1993 air toxics standards to further reduce perc emissions from large industrial and commercial dry cleaners, freestanding small dry cleaners, and small dry cleaners located in apartment buildings.

The majority of dry cleaners in Wisconsin are freestanding small dry cleaners. Freestanding small dry cleaners are the type of dry cleaner you might see in a strip mall or similar shopping center or as a stand-alone building. The proposal would require existing freestanding small dry cleaners to:

- Eliminate all transfer machines (machines requiring the movement of wet clothes from one machine to another for drying). Transfer machines are considered the highest-emitting type of dry cleaning equipment.
- Conduct enhanced Leak Detection and Repair (LDAR) using a halogenated hydrocarbon detector to detect perchloroethylene leaks, repair such leaks and maintain records.

EPA will accept public comments until March 23, 2006. For more information on the proposed rule and for instructions on submitting comments visit

www.epa.gov/air/drycleaningrule/

DNR's Permit Primer (exemptions, permit applications and much more) www.dnr.wi.gov/permitprimer/

The Wisconsin Department of Natural Resources' Permit Primer is an excellent resource for small businesses. This web-based tool walks users through environmental regulations (air, stormwater, hazardous waste, waste water, water supply, etc). The Primer helps businesses determine the need for an environmental permit.

As a step-by-step/question-and-answer tour of the DNR regulatory programs, the Permit Primer helps facilities:

- ✓ determine which environmental requirements apply;
- ✓ determine what permits they need and how to get them;
- ✓ find ways to save money and resources through pollution prevention, waste minimization, conservation and resource protection; and
- ✓ find experts within the DNR that can answer specific questions.

What does the air section cover?

Activities that trigger air permits

The air section helps users determine what actions or activities in their operations may require an air permit depending on whether they are an expanding or existing business. These activities include:

- ✓ using adhesives, paints, inks, other solvents or solvent containing materials that emit Volatile Organic Compounds (VOCs) and/or Hazardous Air Pollutants (HAPs).
- ✓ heating with any fuels (not including electricity) that have emissions of primarily Carbon Monoxide, Sulfur Dioxide, Nitrogen

Oxides and some Hazardous Air Pollutants.

- ✓ grinding, sanding, welding, material handling or any other activity that creates dust (particulate matter) or fumes.

Permit Exemptions

Once the user identifies their activities, the Primer lists a number of specific and general permit exemptions. Fact sheets and different tools, such as spreadsheets, help in determining whether the exemptions apply to your facility.

Air Permit Application Process

If you need to apply for an air permit, the Primer provides guidance to help get you started. The permit application form packet can be very intimidating. The large number of forms in the full packet makes it hard to decipher which ones you really need to use. Most facilities will need to use only five to ten forms, although some may be used multiple times.

The application form guidance in the Primer summarizes the purpose of each form and provides tips about who needs to use that form or why it's necessary.

If you want to go directly to the permit application guidance in the Primer you can find the information as follows:

Construction permit application start page:

<http://www.dnr.state.wi.us/permitprimer/air/construct.html>

Operation Permit Application start page:

<http://www.dnr.state.wi.us/permitprimer/air/operation.html>

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- ☐ Plant Manager, or
- ☐ Owner/President

FET's Environment 06' Conference

The Federation of Environmental Technologists (FET) annual environmental conference is coming up March 6-8, 2006. This year's conference is being held at a new location (Four Points Sheraton - Airport, 4747 South Howell Avenue, Milwaukee, WI).

The conference includes over 100 exhibitors, breakout sessions that discuss environmental regulations and much more.

Conference air topics include:

- Title V Permit Compliance Monitoring and Certification Implications
- Federal Air Regulatory Update
- Ozone and Particulate Air Exceedances: Consequences in Wisconsin
- Wisconsin's Air Toxics (NR 445) Update
- New Source Review Air Update

- Overview of Air Permitting (including federal and state air permit regulations)

There are a number of pre-conference workshops scheduled for Monday March 6th:

- Environmental, Health & Safety Primer
- Train the Environmental Trainer
- Stormwater Permitting
- 8-Hour Hazwoper Review Course

The Small Business Clean Air Assistance Program along with other Wisconsin Pollution Prevention Partners will be hosting an exhibit at the conference.

For more information on the conference visit: www.fetinc.org or contact the FET office at 262-644-0070.